

EXHIBIT A

Page 1

1

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4

5 E. JEAN CARROLL,)
6 Plaintiff,)
7)
8 -against-) 20-cv-7311 (LAK)
9)
10 DONALD J. TRUMP, in his)
11 personal capacity,)
12 Defendant.)
13 _____)
14
15
16
17
18
19
20
21
22
23
24
25

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF
E. JEAN CARROLL
New York, New York
Friday, October 14, 2022

Reported By:

CATHI IRISH, RPR, CRR, CLVS

1 CARROLL - CONFIDENTIAL

2 she's swollen with happiness. That's a
3 prime example.

4 Q. At what point did you decide to
5 file a lawsuit against the defendant?

6 A. Well, wherever I went after the
7 story went people said are you going to
8 sue him, are you going to sue him and I
9 would say no, no, no, not going to do it.
10 I'm just not -- and then I had a
11 conversation with someone who knew the ins
12 and outs, an actual lawyer, and he said
13 you should really seriously think about
14 this.

15 Q. Who was that lawyer without
16 getting into the conversation?

17 A. George Conway.

18 Q. How did you meet George Conway?

19 A. Met him at a party at Molly
20 Jong-Fast's house.

21 Q. Was he your lawyer at the time?

22 A. No, no, no, no.

23 Q. Where was that?

24 A. Manhattan, 83rd Street or 84th
25 Street.

1 CARROLL - CONFIDENTIAL

2 A. No.

3 Q. So after you spoke to George, did
4 you retain counsel?

5 A. Yes.

6 Q. How soon after?

7 A. The day after. The day -- two
8 days later.

9 Q. Did George recommend Ms. Kaplan?

10 A. Yes, he did.

11 Q. Are you presently paying your
12 counsel's fees?

13 A. This is a contingency case.

14 Q. So you're not paying expenses or
15 anything out of pocket to date; is that
16 correct?

17 A. I'm not sure about expenses. I
18 have to look that up.

19 Q. Is anyone else paying your legal
20 fees, Ms. Carroll?

21 A. No.

22 Q. You speak a lot about the Adult
23 Survivors Act being passed and we've
24 discussed numerous people who have
25 attacked you, assaulted you; is that

Page 233

1 CARROLL - CONFIDENTIAL

2 C E R T I F I C A T E

3 STATE OF NEW YORK)

4 : ss.

5 COUNTY OF NASSAU)

6

7 I, CATHI IRISH, a Registered
8 Professional Reporter, Certified Realtime
9 Reporter, and Notary Public within and for
10 the State of New York, do hereby certify:

11 That E. JEAN CARROLL, the witness
12 whose deposition is hereinbefore set
13 forth, was duly sworn by me and that such
14 deposition is a true record of the
15 testimony given by the witness.

16 I further certify that I am not
17 related to any of the parties to this
18 action by blood or marriage, and that I am
19 in no way interested in the outcome of
20 this matter.

21 IN WITNESS WHEREOF, I have hereunto
22 set my hand this 17th day of October,
23 2022.

24



25

CATHI IRISH, RPR, CRR, CLVS